

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CHELSEA KOENIG, on behalf of herself and all others similarly situated,

Plaintiff,

v.

PRIMANTI CORPORATION D/B/A PRIMANTI BROS.; DAVID HEAD; ANDREW TAUB; DEMETRIOS PATRINOS; JAMES CHU; NICHOLAS NICHOLAS; and DOE DEFENDANTS 1-10,

Defendants.

Civil Action No. 16-1402
Hon. Nora Barry Fischer

**PLAINTIFF'S MOTION FOR FINAL APPROVAL
OF CLASS AND COLLECTIVE ACTION SETTLEMENT, CERTIFICATION
OF SETTLEMENT CLASS, AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND SERVICE PAYMENT TO PLAINTIFF**

Plaintiff Chelsea Koenig ("Plaintiff") respectfully requests that the Court enter an Order: (i) granting final approval of the class action settlement; (ii) certifying the Settlement Class; (iii) approving a Service Payment award for Plaintiff; (iv) granting Class Counsel's requested award of attorneys' fees and expenses; and (v) such further and other relief as this Court deems just and proper. Plaintiff is submitting a proposed Final Approval Order attached hereto and incorporated herein. In further support of this Motion, Plaintiff is contemporaneously filing the following:

- (1) Memorandum of Law in Support in Support of Plaintiff's Unopposed Motion for Final Approval of Class And Collective Action Settlement;
- (2) Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Payment to Plaintiff; and
- (3) Declaration of Gerald D. Wells, III in Support of Plaintiff's Motion for Final Approval of Class And Collective Action Settlement, and exhibits thereto.

By Order entered on January 17, 2018, the Court scheduled the hearing on this Motion for April 23, 2018, at 9:00 a.m. in Courtroom 5-B, United States District Court for the Western District of Pennsylvania, 700 Grant Street, Pittsburgh, Pennsylvania 15219. At said hearing, Class Counsel will present oral argument in support of this Motion.

Dated: April 16, 2018

Respectfully submitted,

CONNOLLY WELLS & GRAY, LLP

/s/ Gerald D. Wells, III

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*Counsel for Plaintiff and the Proposed
Classes*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of April 2018, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Gerald D. Wells, III
Gerald D. Wells, III